UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JEREMY LEVIN and DR. LUCILLE LEVIN,

Plaintiffs,

-V-

THE BANK OF NEW YORK MELLON, JPMORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., SOCIÉTÉ GÉNÉRALE, and CITIBANK, N.A.

Defendants.

THE BANK OF NEW YORK MELLON, JPMORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., SOCIÉTÉ GÉNÉRALE, and CITIBANK, N.A.

Third-Party Plaintiffs,

-V-

STEVEN M. GREENBAUM, et al.

Third-Party Defendants.

(FILED PARTIALLY UNDER SEAL DUE TO CONFIDENTIAL INFORMATION SUBJECT TO PROTECTIVE ORDER)

Civ. No. 09 CV 5900 (RPP) (MHD)

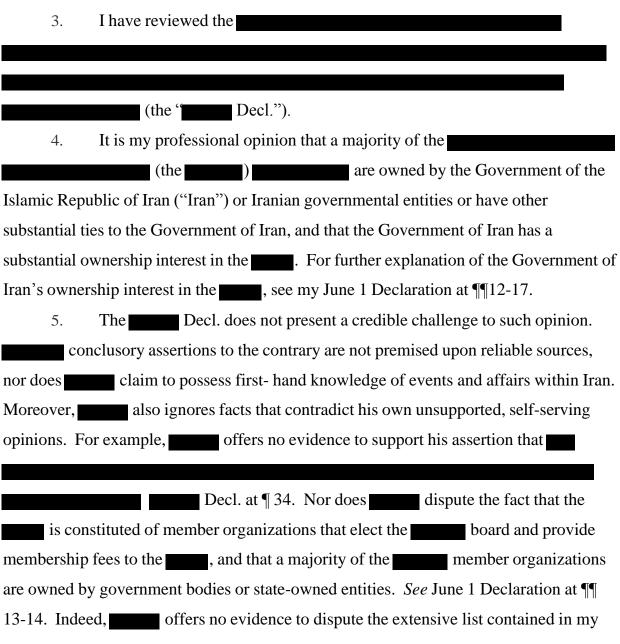
DECLARATION OF JAMES M.
DORSEY IN SUPPORT JUDGMENT
CREDITORS' REPLY IN SUPPORT
OF RENEWED JOINT MOTION FOR
PARTIAL SUMMARY JUDGMENT
ON SINGLE PHASE TWO ASSET
AND OPPOSITION TO DEFENDANT

MOTION FOR SUMMARY JUDGMENT

DECLARATION OF JAMES M. DORSEY

I, James M. Dorsey, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, declare:

- 1. I am an adult citizen of the Federal Republic of Germany and a resident of the Republic of Singapore.
- 2. My qualifications are listed in my Declaration dated June 1, 2014, in Support of the Judgment Creditors' Renewed Joint Motion for Partial Summary Judgment on Single Phase Two Asset ("June 1 Declaration"), at ¶¶ 2-11.



| June 1 Declar | ation ofn | nember organi | zations which | are owned by t | he Govern | ment |
|------------------|------------------|-----------------|------------------|-----------------|------------|---------|
| of Iran or state | e-owned entities | s. <i>Id</i> . | | | | |
| 6. | The Governmen | nt of Iran orga | nized the | and | the 1 | nas |
| been a membe | er of the | | | | | |
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| 7. | The | es an importai | nt national purp | oose in Iran. E | stablished | shortly |
| after the 1979 | Islamic overthr | ow of the shal | n, the | | | |
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| 10. | In order to avoid the scrutiny of global governance bodies such as the |
| some lengths | to conceal its influence and control over the which it exercises |
| | ough its control of the that are the voting members, as is |
| documented | in my June 1 Declaration at ¶¶ 12-18. The government effort to control |
| | , started shortly after the 1979 revolution when all were |
| | by the Islamic Republic in part because their former owners had been |
| | ith the regime of the Shah. |
| 11. | To ensure control, Iran established within the first year of the Islamic |
| revolution th | e , which funded many of the |
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| executives and board members are, more often than not, politicians |
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| or people with close ties to the government. My Declaration of June 1, 2014 lists 11 |
| Iranian government officials who have prominent roles in the and its member |
| organizations. |
| 16. agrees that " |
| Decl. at ¶ 31. The Iranian Revolutionary Guard Corp. (the "IRGC") has been |
| accused of supporting terrorism and has been charged with the kidnapping and murder of |
| Americans. The court in the underlying Levin action made a factual finding that the |
| IRGC, a branch of the Iranian Government, committed terrorist acts against Mr. Levin. |
| See Levin v. Islamic Republic of Iran, 529 F. Supp. 2d 1 (D.D.C. 2007). |
| 17. It is my opinion that the has the exclusive right to organize and |
| manage in Iran as well as to organize and manage the |
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| 18. It is my opinion that the Government of Iran in fact treats the | as an |
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| arm and instrument of the Government, notwithstanding any nominal design | |
| independence. | |
| 19. To conclude that the is an | |
| relies on and its review of the | |
| Decl. at ¶¶ 24-35. | |
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| . My June 1 Declaration extensively documents the status in | n 2010 as an |
| agency and instrumentality of the state. does not provide any eviden | |
| contrary. | |
| 20. The | |
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| I declare under foregoing is tru | | e laws of the United States of America that the |
| Tolegoing is tru | ie and correct. | |
| Executed this_ | 19th | day of <u>July</u> , 2014 in Singapore |
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| | | James M. Dorsey |